

EXHIBIT 3

Page 1

1 - STUART VARDAMAN -

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK3 ----- X
4 ULKU ROWE,

5 Plaintiff,

6 Case No.
7 19 Civ. 08655(LGS)(GWG)

8 v.

9 GOOGLE LLC

10 Defendant.

11 DATE: November 17, 2020

12 TIME: 9:37 a.m.

13
14 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
15 OF STUART VARDAMAN, held via Zoom, pursuant to ^
16 Notice, before Hope Menaker, a Shorthand Reporter
17 and Notary Public of the State of New York.

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Stuart Vardaman
November 17, 2020

42 to 45

	Page 42	Page 44
1	<p style="text-align: center;">- STUART VARDAMAN -</p> <p>2 her background was?</p> <p>3 A. Not that I recall. I think it was</p> <p>4 known that she had an industry background.</p> <p>5 Q. What did you know about her industry</p> <p>6 background?</p> <p>7 A. I think that she was at JPM. Yeah,</p> <p>8 that's pretty much it.</p> <p>9 Q. That's pretty much all you knew about</p> <p>10 her background?</p> <p>11 A. Correct.</p> <p>12 Q. Do you know what role she had at</p> <p>13 JPM?</p> <p>14 A. No, not that I recall.</p> <p>15 Q. Do you know how many years she had in</p> <p>16 the financial services industry?</p> <p>17 A. Not -- no, not that I recall.</p> <p>18 Q. Do you know what her technological</p> <p>19 background was, her technology background?</p> <p>20 A. No.</p> <p>21 Q. Do you know what advanced degrees she</p> <p>22 had?</p> <p>23 A. I don't recall --</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. -- ma'am.</p>	<p>1 - STUART VARDAMAN -</p> <p>2 conversation early on where I highlighted the</p> <p>3 process and that we were putting her in process</p> <p>4 and I'm -- I'm -- over the course of that</p> <p>5 conversation, yeah, we may have spent some time on</p> <p>6 her background.</p> <p>7 Q. Are you referring to a conversation</p> <p>8 you had with Ms. Rowe?</p> <p>9 A. Yeah.</p> <p>10 Q. When was that conversation?</p> <p>11 A. Oh, goodness. It would have been</p> <p>12 after Tariq asked our team to put her in process</p> <p>13 for the head of financial services.</p> <p>14 Q. Please tell me everything you recall</p> <p>15 about that conversation.</p> <p>16 A. Given she was a Googler, I wanted to</p> <p>17 share with her the process that we were running</p> <p>18 and we spent some time talking about her</p> <p>19 background as a means to spend a few minutes,</p> <p>20 quote/unquote, getting to know each other.</p> <p>21 Q. What did you discuss about her</p> <p>22 background?</p> <p>23 A. I don't recall. It was quite some</p> <p>24 time ago.</p> <p>25 Q. How long did that conversation last?</p>
1	<p style="text-align: center;">- STUART VARDAMAN -</p> <p>2 Q. Did you know --</p> <p>3 A. I was asked to put her in process and</p> <p>4 I did.</p> <p>5 Q. Okay. I'm asking: At any point in</p> <p>6 time, did you learn what her qualifications were?</p> <p>7 A. No.</p> <p>8 Q. At any point in time, did you learn</p> <p>9 what her industry background was beyond the fact</p> <p>10 that she worked at JPM?</p> <p>11 A. At any point in time?</p> <p>12 Q. Yes.</p> <p>13 A. No.</p> <p>14 Q. At any point in time, did you learn</p> <p>15 what her management background was managing teams?</p> <p>16 A. No.</p> <p>17 Q. At any point in time, did you learn</p> <p>18 what advanced degrees she had?</p> <p>19 A. You already asked that question.</p> <p>20 Q. I'm asking now at any point in time.</p> <p>21 A. No, I didn't spend time on it.</p> <p>22 Q. At any point in time, did you do</p> <p>23 anything to educate yourself about her</p> <p>24 qualifications for the role?</p> <p>25 A. Ma'am, you know, we may have had -- a</p>	<p>1 - STUART VARDAMAN -</p> <p>2 A. I -- I can't say for sure.</p> <p>3 Q. Was it more than five minutes?</p> <p>4 A. I'm sorry, did you say more than five</p> <p>5 minutes?</p> <p>6 Q. Yes.</p> <p>7 A. Yes, for -- for sure.</p> <p>8 Q. Was it more than fifteen minutes?</p> <p>9 A. If I think about conversations like</p> <p>10 that it probably would have clocked in at about</p> <p>11 forty-five minutes, but again I can't state for</p> <p>12 sure.</p> <p>13 Q. At any point in time, did you review</p> <p>14 Ms. Rowe's resume?</p> <p>15 A. I don't remember.</p> <p>16 Q. At any point in time, did you review</p> <p>17 Ms. Rowe's LinkedIn profile?</p> <p>18 A. I'm sure I would have come across it,</p> <p>19 yeah.</p> <p>20 Q. Do you recall whether you reviewed</p> <p>21 it?</p> <p>22 A. Reviewing and looking at it, yeah,</p> <p>23 probably.</p> <p>24 Q. I'm asking if you have an independent</p> <p>25 recollection of actually viewing it or just you</p>

Stuart Vardaman November 17, 2020

46 to 49

Page 46	Page 48
1 - STUART VARDAMAN - 2 are assuming you would have. 3 A. I'm assuming that I would have. 4 Q. Do you recall anything else with 5 respect to the conversation you had with Mr. 6 Shaukat regarding her entering the process? 7 A. The conversations specifically, no. 8 Again, he asked to include her in the process and 9 we made that happen. 10 Q. Did you understand her to have raised 11 her hand to be considered for the position? 12 A. I don't recall -- 13 MR. GAGE: Objection. 14 A. I don't recall if she had applied. 15 Q. Do you recall being interviewed by 16 employee relations in connection with Ms. Rowe? 17 A. Whether or not I knew on the outset 18 it had to do with Ulku I can't say for sure, but I 19 think the content of that conversation centered 20 there or as a topic. So, yeah, I do recall 21 speaking with employee relations. 22 Q. Did you actually get interviewed on 23 two occasions by employee relations? 24 A. It's possible. 25 Q. Do you recall telling employee	1 - STUART VARDAMAN - 2 asked us to put her in process. 3 Q. Were you surprised that Mr. Shaukat 4 was considering someone at a Level 8? 5 A. That was my assumption on her level. 6 My job is not to be surprised. When my hiring 7 manager asks me to involve a Googler in the 8 process, I do that. 9 Q. Did Mr. Shaukat share with you that 10 she was wasn't senior enough for the role, but he 11 still wanted you to put her in the process anyway? 12 A. Not that I recall. 13 MS. GREENE: We have been going about 14 an hour, does anyone need a short break? 15 Let's take a five-minute break and 16 we'll come back and continue on. Our -- our 17 videographer will take it off the record. 18 MR. GAGE: Okay. 19 THE VIDEOGRAPHER: Going off the 20 record, the time is 10:41 a.m. New York time. 21 (Whereupon, a brief discussion was 22 held off record.) 23 THE VIDEOGRAPHER: The time is 10:49 24 a.m. New York time, we're back on the record. 25 Q. Okay. Mr. Vardaman, I would like you
1 - STUART VARDAMAN - 2 relation -- employee relations that she may have 3 bubbled it up, the position, herself to Tariq? 4 A. I don't recall saying that exactly. 5 Q. Whether you said that exactly, in sum 6 or substance do you recall saying to ER that she 7 might have been the one to raise her hand for that 8 position? 9 A. I -- I really can't say. I don't 10 remember the exact context and all the content of 11 that discussion. 12 Q. Do you recall, putting aside that 13 discussion, whether at any point in time you 14 learned that Ms. Rowe had raised her hand to be 15 considered for the position? 16 A. I -- I'm sorry, I'm having trouble 17 remembering the detail that you want. 18 Q. Do you recall whether you had 19 conversations with Ms. Rowe about whether she was 20 the one to throw her hat into the ring, so to 21 speak? 22 MR. GAGE: Objection. 23 A. No. As I mentioned -- sorry, my 24 screen keeps blanking out. As I mentioned, I 25 connected with her. I believe it was after Tariq	1 - STUART VARDAMAN - 2 to look back at the Box again and you may need to 3 refresh. 4 A. Okay. 5 Q. And we're looking for a document that 6 was previously marked as Exhibit 51. Tell me when 7 you have that open. 8 A. Forgive me. I'm not trying to be 9 dense here. What you do you mean previously 10 marked as 51? Can you share the whole title. 11 Q. It says "Exhibit 51" in the Box. 12 A. Okay. Well, I have two 51s in there. 13 MR. GAGE: And this one says 14 X0051Bern version. 15 A. Okay, okay. Okay, I got it. 16 MR. GAGE: That just simply means it 17 was marked as an exhibit during a prior deposition. 18 THE WITNESS: Ah. Okay, got it. 19 Q. Do you have that document open? 20 A. I do. 21 Q. Okay. The document you're looking at 22 was previously marked as Exhibit 51, Bates stamped 23 GOOG-ROWE-00056990 through 014. So if you look at 24 this document, in the upper right-hand corner are

Stuart Vardaman November 17, 2020

66 to 69

Page 66	Page 68
1 - STUART VARDAMAN -	1 - STUART VARDAMAN -
2 A. I do.	2 had -- had stepped back from the panel interviews
3 Q. Does that refresh your recollection	3 and -- and so we ultimately landed at the
4 about whether Mr. Stevens was supportive of her	4 panelists that were -- that are listed in -- in
5 interviewing for the role?	5 GHire, I guess.
6 A. Honestly, that would have been a	6 Q. Looking again at Exhibit 106 under
7 conclusion that I reached given -- given Eryka's	7 "Impression," the bullet "Impression."
8 e-mail, the previous exhibit.	8 You write "Executive poise confident,
9 Q. At any point in time, did anyone tell	9 but not ego driven, forthright with a quick
10 you that Mr. Stevens was not supportive of her for	10 operating cadence." Do you see that?
11 the role?	11 A. Yes, I do.
12 A. No.	12 Q. What was that impression based on?
13 Q. Did you discuss that with Mr.	13 A. That would have been my meeting with
14 Shaukat?	14 her, the -- the one that I had mentioned was
15 A. Discuss what?	15 probably around 45 minutes. Again, this is my
16 MR. GAGE: Objection.	16 attempt in my job to help ensure that candidates
17 Q. Whether Mr. Stevens was supportive of	17 are -- are putting their best foot forward with
18 her for the role.	18 the information that -- that I tee up panel
19 A. No, that would have been a	19 members for. I -- yeah.
20 conversation between VPs.	20 Q. You've only been giving accurate
21 If, you know, I can shed a little bit	21 information as part of these e-mails, correct?
22 more light about my intent in these, messages like	22 A. Yes, for the benefit of the
23 these for candidates both in Goog -- in internal	23 candidate. I can tell you that my personal
24 and external, it's a -- it's an attempt to help	24 impression in my conversation was -- was that I
25 the candidates put their best foot forward so that	25 was talked down to that I felt as -- as a result
Page 67	
1 - STUART VARDAMAN -	1 - STUART VARDAMAN -
2 a panel member could read some of this and say	2 of my level.
3 okay, I am -- I am interested in meeting this	3 Q. What made you feel like you were
4 candidate and -- and so there -- there's some	4 talked down to?
5 content in there to -- to help, in this case, Ulku	5 A. There was a perceptible, perceivable
6 put her best foot forward.	6 annoyance I think with the -- the conversation
7 Q. Who made the decision about who Mr.	7 that -- that she had with me.
8 Rowe's interview panel would be?	8 Q. And tell me about that.
9 MR. GAGE: Objection.	9 A. I felt dismissed at the end of the
10 A. That would have been a conversation	10 day as a result of my conversation with -- with
11 likely during one of our meetings between Tariq	11 Ulku.
12 and Fiona O'Donnell at the time. It would have	12 Q. What did she say that made you feel
13 been a -- Tariq's business partner -- HR business	13 dismissed?
14 partner, excuse me, and me.	14 A. I don't recall specifics.
15 And, if -- if I can, the -- the	15 Q. What made you say -- what did she say
16 reason that that's a discussion is because we want	16 that made you perceive that she was annoyed?
17 panel members, A, to be objective, but then, B,	17 MR. GAGE: Objection.
18 representative of relationships that a given	18 A. It would have been a combination of
19 candidate might be expected to work with closely	19 her -- I -- I think of her demeanor and her -- her
20 for the benefit of our -- of our customers.	20 word choice in that meeting with me, but again the
21 Q. What did you discuss with respect to	21 specifics I -- I don't recall exactly.
22 who would be the panel members for Ms. Rowe's	22 Q. What about her demeanor?
23 interview?	23 MR. GAGE: Objection.
24 A. I don't recall specifics. As -- as I	24 A. Again, the conclusion I felt as a
25 had mentioned in an earlier exhibit, Brian	25 result of interacting with her was that I felt

Stuart Vardaman November 17, 2020

70 to 73

	Page 70		Page 72
1	- STUART VARDAMAN -	1	- STUART VARDAMAN -
2	dismissed and -- and talked down to I -- I guess	2	no, ma'am. I mean, we're -- we're getting back to
3	by the fact I was having and requesting a meeting	3	2018 here and -- and I'm -- you know, I -- I just
4	with her to -- to shed light on the process.	4	-- just don't -- don't recall the specifics.
5	I think it's important to note that	5	Q. Do you recall whether she was unhappy
6	none of that came out here in this note to Jason	6	with the process as opposed to being unhappy with
7	in advance of the interview prep, hence going back	7	you?
8	to what I said earlier about ensuring that the	8	A. No. I -- I don't recall the -- any
9	candidates are being presented the best possible	9	-- any difference there. If I were in her shoes,
10	light.	10	I would have been excited to run the process.
11	Q. I understand how you felt leaving	11	Q. Did Mr. Shaukat interview her for the
12	that meeting. Now I want you to explain to me	12	role?
13	what she did or what she said that led you to feel	13	A. It depends on what you mean by
14	that way.	14	"interview." I don't -- I don't know if there's a
15	MR. GAGE: Objection. Asked and	15	specific meeting document in GHire.
16	answered.	16	Q. Do you know if at any point in time
17	A. Again I -- I can't recall the	17	he met with her to discuss her qualifications for
18	specifics, ma'am. There is an aspect of being	18	the role?
19	successful at Google, which is this notion of	19	A. No, ma'am, I don't have insight into
20	Googleyness, and part of that is encapsulated	20	that meeting.
21	with openly and actively working across the	21	Q. Do you know if that meeting ever took
22	organization regardless of level, sometimes L 2s.	22	place?
23	And, again, my impression/feeling after my	23	A. No, ma'am, I really don't.
24	conversation with Ulku was that I was dismissed	24	Q. Would -- you described for me as a --
25	and be -- because of level.	25	as a point in the process that Mr. Shaukat would
	Page 71		Page 73
1	- STUART VARDAMAN -	1	- STUART VARDAMAN -
2	Q. What was the last thing, because of	2	meet with candidates. Do you know whether he did
3	what?	3	that with Ms. Rowe?
4	A. Because of my level, being an L 6 and	4	A. I don't. What I was describing there
5	being involved in this process as -- as	5	was largely for external candidates.
6	essentially the facilitator of -- of the process	6	Q. Did Mr. Shaukat ever share feedback
7	we were running.	7	with respect to his view of her qualifications for
8	Q. Did she know your level?	8	the role?
9	A. I don't know.	9	MR. GAGE: Objection.
10	Q. Did you do anything to document your	10	A. His view -- I'm sorry?
11	impressions leaving that meeting?	11	Q. Did Mr. Shaukat --
12	A. I don't think so, no.	12	A. His view on who? I'm sorry.
13	Q. Did you share those impressions with	13	Q. I'll re-ask the question. Did Mr.
14	anyone?	14	Shaukat ever share with you his view of Ms. Rowe's
15	A. No, it's not my job.	15	qualifications for her consideration for the --
16	Q. In that meeting, did Ms. Rowe express	16	the head of financial services role?
17	any frustration that she had not been contacted	17	A. No, ma'am.
18	before about the position?	18	Q. Did you ever ask him for
19	A. Not that I recall, no, ma'am.	19	documentation related to his view of her
20	Q. Do you recall her again noting	20	qualifications for that role?
21	that -- or alluding to your recruiting process	21	A. No, ma'am. Again, he -- he asked me
22	when she joined and that she thought OCTO group	22	to involve her in the process and because she's a
23	was a holding place until verticalization?	23	Googler, that's -- largely how the process
24	A. Verticalization, this stuff on the	24	manifested for Ulku is exactly what we would have
25	last couple of docu -- or couple of exhibits ago,	25	done for -- for a Googler whom Tariq wanted to

Stuart Vardaman November 17, 2020

98 to 101

	Page 98	Page 100
1	<p style="text-align: center;">- STUART VARDAMAN -</p> <p>(The question and answer requested was read back by the reporter.)</p> <p>MR. GAGE: Yeah, I thought there was more to his answer because I got bits and pieces of kind of a clipped response on the video as it froze.</p> <p>Q. So let me ask the question again --</p> <p>A. Okay.</p> <p>Q. -- and we can go through. Who made the decision that she was not viable for the role?</p> <p>MR. GAGE: Objection.</p> <p>A. What I captured there is not a decision and that must have been referencing the information I'd received from Darryl and Jason.</p> <p>Q. So this was your -- this was reflecting your impression based on what you heard from Darryl and Jason?</p> <p>A. Yeah, most likely.</p> <p>Q. And what you heard from them came in the form of a ping; is that right?</p> <p>A. That is correct.</p> <p>Q. Okay. We're going to go down again. Give me a minute, I might be able to tell what you page.</p>	<p style="text-align: center;">- STUART VARDAMAN -</p> <p>looks like he had some questions on her ability to spur followership.</p> <p>Q. Did he share anything more with you?</p> <p>A. No, ma'am, not that I recall.</p> <p>Q. Okay. We're going to go down again to Page 117, the page Bates stamped 838 and you see this is August 10th, 2018?</p> <p>A. Yes.</p> <p>Q. And --</p> <p>MR. GAGE: I'm sorry, 8 -- 830 what?</p> <p>MS. GREENE: 838. 8-3-8.</p> <p>MR. GAGE: Oh, okay. I thought you said 113.</p> <p>MS. GREENE: 117 is the PDF number.</p> <p>MR. GAGE: All right.</p> <p>Q. And if you turn to the next page and look at the entry for Ms. Rowe, "This is awaiting complete feedback. Met with Sebastian, 8/2. Darryl, Jason, Vats, 8/8. Vats liked her. Darryl liked her. Had some questions followership." Do you see that?</p> <p>A. I do.</p> <p>Q. So this is approximately two days after those -- the interview completed, correct?</p>
1	<p style="text-align: center;">- STUART VARDAMAN -</p> <p>Okay. We're going to Page 104 in the PDF which is Bates Page 825 and you might need to look to the prior page to see the date, this is August 24th, 2018. Do you see that?</p> <p>A. I do.</p> <p>Q. Okay. Then going down to the entry for Ulku Rowe it says "Chasing feedback" and does that indicate as of August 24th you were still chasing feedback?</p> <p>A. In the system, yes.</p> <p>Q. It says "Met with Sebastian 8/2, Darryl, Jason, Vats 8/8. Vats liked her. Darryl liked her. Had some questions followership." Do you see that?</p> <p>A. I do.</p> <p>Q. Does this reflect what had been communicated to you by Vats and Darryl?</p> <p>A. Yeah, must have. Yeah, because I wrote it.</p> <p>Q. Do you recall Darryl saying he liked her?</p> <p>A. I don't, but I think as a -- as a matter of practice I would have captured the sentiment and it -- and, as you can see here, it</p>	<p style="text-align: center;">- STUART VARDAMAN -</p> <p>8/8 and this is 8/10, yes.</p> <p>Q. So between 8/10 -- well, at any point after 8/10, did you receive any other feedback with respect to Ms. Rowe?</p> <p>A. I -- I really don't remember. It's a flurry of activities to get people to enter their feedback into GHire.</p> <p>Q. If you had received additional -- well, let me ask you this. With respect to the feedback that you did receive from Mr. Willis, is it reflected here in this entry?</p> <p>A. Yeah, I think so.</p> <p>Q. Is there any reason why you did not include feedback that you had received from Mr. Martin in this entry?</p> <p>A. I may not have been able to get any.</p> <p>Q. And so your understanding was that at least two of the people that she interviewed with liked her, correct?</p> <p>MR. GAGE: Objection.</p> <p>A. From their perspective, that was what I had received. If I translated it here, there's considerable nuance beneath that which is why I was orienting people toward the entering</p>

<p style="text-align: right;">Page 106</p> <p>1 - STUART VARDAMAN -</p> <p>2 (Whereupon, Exhibit 111 was marked at</p> <p>3 this time.)</p> <p>4 Q. Do you recognize this as a</p> <p>5 communication from yourself dated 12 November,</p> <p>6 2018?</p> <p>7 A. I do.</p> <p>8 Q. And who is Dave Beuerlein?</p> <p>9 A. Dave Beuerlein was the leader, the</p> <p>10 director of the organization I mentioned earlier</p> <p>11 that I was a part of, the kind of broader LST</p> <p>12 group that worked across the various product</p> <p>13 areas.</p> <p>14 Q. Do you see where it says "VP</p> <p>15 Financial Services"?</p> <p>16 A. Yes, I do.</p> <p>17 Q. Is that referring to the head of</p> <p>18 financial services role?</p> <p>19 A. I think so, yes.</p> <p>20 Q. And it says "Two finalists: [REDACTED]</p> <p>21 [REDACTED] and [REDACTED] external.</p> <p>22 Both candidates have completed all stages in the</p> <p>23 process. [REDACTED] met Diane Greene on 10/11 and we</p> <p>24 have been in a holding pattern since then. The</p> <p>25 next step would be to choose the candidate and</p>	<p style="text-align: right;">Page 108</p> <p>1 - STUART VARDAMAN -</p> <p>2 Q. So is it your testimony that she was</p> <p>3 not rejected for the role?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. As I recall, Tariq was going to</p> <p>6 circle back with her and let her know where things</p> <p>7 landed with Thomas Kurian joining and -- and</p> <p>8 ultimately the cancelation.</p> <p>9 Q. So, again, is it your testimony that</p> <p>10 she was not suggested for the role, that the role</p> <p>11 closed before there had been a determination with</p> <p>12 respect to Ms. Rowe; is that your testimony?</p> <p>13 A. Correct --</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. -- the role closed.</p> <p>16 Q. Did Mr. Shaukat tell you that he had</p> <p>17 received a communication from Ms. Rowe saying that</p> <p>18 she thought she was more qualified than the two</p> <p>19 finalists?</p> <p>20 A. No.</p> <p>21 Q. Did Mr. Shaukat tell you that she had</p> <p>22 told him that she thought he should just give her</p> <p>23 the role?</p> <p>24 A. No, I don't recall that.</p> <p>25 Q. Did Mr. Shaukat tell you that she had</p>
<p style="text-align: right;">Page 107</p> <p>1 - STUART VARDAMAN -</p> <p>2 begin the packet process." Do you see that?</p> <p>3 A. I do.</p> <p>4 Q. As of November 12th then, had it been</p> <p>5 determined that the two finalists for the position</p> <p>6 were [REDACTED] and [REDACTED]?</p> <p>7 A. No, honestly that looks like an</p> <p>8 oversight on my part.</p> <p>9 Q. That you did not know?</p> <p>10 A. Correct, and Dave -- or in my email</p> <p>11 to Dave, I reference the -- the ping</p> <p>12 conversation. I'm not sure what the context of</p> <p>13 that -- or I don't recall what the context of that</p> <p>14 ping conversation was.</p> <p>15 Q. But here you don't make any mention</p> <p>16 of Ms. Rowe as a finalist for the position,</p> <p>17 correct?</p> <p>18 A. That is correct.</p> <p>19 Q. At any point in time was a</p> <p>20 determination made, that you know of, that Ms.</p> <p>21 Rowe was not a candidate anymore for the position?</p> <p>22 A. No.</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. Again, the -- the search concluded</p> <p>25 being canceled with no candidate being selected.</p>	<p style="text-align: right;">Page 109</p> <p>1 - STUART VARDAMAN -</p> <p>2 raised a concern about discrimination?</p> <p>3 A. No, ma'am.</p> <p>4 Q. Did he tell you that she had raised a</p> <p>5 concern about her levelling?</p> <p>6 A. No.</p> <p>7 Q. Did he tell you that she had raised</p> <p>8 a concern that her initial leveling was</p> <p>9 under-leveled and that was impacting her</p> <p>10 consideration for the VP position?</p> <p>11 A. For the lead financial services</p> <p>12 position, no, not that I recall. Tariq typically</p> <p>13 didn't share such -- such things, even if he would</p> <p>14 have insight into them.</p> <p>15 Q. Did Mr. Shaukat tell you that ER was</p> <p>16 looking into concerns that Ms. Rowe had raised?</p> <p>17 A. Not that I recall, no.</p> <p>18 Q. Did Mr. Shaukat tell you that he was</p> <p>19 concerned that she might leave Google?</p> <p>20 A. Not that I recall, no.</p> <p>21 Q. Did you form your own opinion about</p> <p>22 Ms. Rowe as a candidate for the VP of financial</p> <p>23 services position?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. My opinion, given she was a Googler,</p>